

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Cr. No. 15-10149-RWZ
)
v.) VIOLATION:
)
1. ILEANA VALDEZ,) 21 U.S.C. § 846 --
a/k/a "Lori," and a/k/a "Lorena,") Conspiracy to Distribute Cocaine
Base, Cocaine and Heroin
Defendant.)
) 18 U.S.C. § 1956(a)(1)(B)(i) --
) Money Laundering Concealment
)
) 18 U.S.C. § 1957 --
) Money Laundering Spending
)
) 21 U.S.C. §§ 853 and 982 --
) Criminal Forfeiture Allegations

SUPERSEDING INFORMATION

The United States Attorney charges:

COUNT ONE: (Title 21, United States Code, Section 846 – Conspiracy to Distribute Cocaine, Cocaine Base and Heroin)

From a time unknown to the U.S. Attorney and continuing until on or about June 18, 2015, at Boston, and elsewhere in the District of Massachusetts and at other places known and presently unknown:

1. **ILEANA VALDEZ**
a/k/a "Lori," and
a/k/a "Lorena,"

defendant herein, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown, to distribute and to possess with intent to distribute heroin, a Schedule I controlled substance, and cocaine and cocaine base, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

The United States Attorney further charges that the conspiracy described herein involved 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(i). Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(i) is applicable to this count.

The United States Attorney further charges that 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, are attributable to and were reasonably foreseeable to defendant **ILEANA VALDEZ**. Accordingly, Title 21, United States Code, Section 841(b)(1)(A)(i), is applicable to this count as to this defendant.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO: (18 U.S.C. § 1956(a)(1)(B)(i) – Concealment Money Laundering)

The United States Attorney further charges that:

From January 13, 2014 and continuing until on or about December 18, 2014, at Boston, and elsewhere in the District of Massachusetts and at other places known and presently unknown:

**1. ILEANA VALDEZ
a/k/a “Lori,” and
a/k/a “Lorena,”**

defendant herein, did knowingly conduct, and attempt to conduct, financial transactions affecting interstate commerce, as set forth below, knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, which transactions in fact involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, as set forth below:

Deposits of U.S. currency by **ILEANA VALDEZ** into three bank accounts in the name of **ILEANA VALDEZ** from in or about January 13, 2014, through in or about December 18, 2014, totaling \$76,340.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT THREE: (18 U.S.C. § 1957 - Unlawful Monetary Transaction)

The United States Attorney further charges that:

From January 13, 2014 and continuing until on or about December 18, 2014, at Boston, and elsewhere in the District of Massachusetts and at other places known and presently unknown:

**2. ILEANA VALDEZ
a/k/a "Lori," and
a/k/a "Lorena,"**

defendant herein, did knowingly engage and attempt to engage, and attempt to engage in a monetary transaction, as set forth below, by, through, and to a financial institution affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, knowing that the property was derived from some form of unlawful activity, as set forth below:

The re-payment of a Wells Fargo Auto Loan for the purchase of a certain Chevrolet HHR SUV for approximately \$11,234 in cash.

All in violation of Title 18, United States Code, Sections 1957 and 2.

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The United States Attorney further alleges that:

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 846, set forth in Count One of this Superseding Information:

1. ILEANA VALDEZ
a/k/a “Lori,” and
a/k/a “Lorena,”

defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense. The property to be forfeited includes but is not limited to, the following:

- (a) one gray 2008 BMW 528 XI bearing VIN WBANV13598BZ48866 and Massachusetts Registration 753WT9;
- (b) all funds on deposit in Bank of America, N.A. account number *****7415, held in the name of Ileana Valdez, up to the amount of \$54,950;
- (c) \$9,205 in United States currency seized on June 18, 2015;
- (d) three black T-Mobile flip cell phones;
- (e) one silver Samsung cell phone;
- (f) one silvery blue and black colored Samsung T-Mobile flip cell phone;
- (g) one gray T-Mobile Samsung flip cell phone;
- (h) one black and dark blue LG flip cell phone; and
- (i) one T-Mobile HD7 HTC Windows cell phone

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant –

- (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be subdivided without difficulty;
- (a) it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

MONEY LAUNDERING FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(1))

The United States Attorney further alleges that:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957, set forth in Counts Two and Three of this Superseding Information,

1. ILEANA VALDEZ
a/k/a “Lori,” and
a/k/a “Lorena,”

defendant herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- (a) one gray 2008 BMW 528 XI bearing VIN WBANV13598BZ48866 and Massachusetts Registration 753WT9;
- (b) all funds on deposit in Bank of America, N.A. account number *****7415, held in the name of Ileana Valdez, up to the amount of \$54,950;
- (c) \$9,205 in United States currency seized on June 18, 2015;
- (d) three black T-Mobile flip cell phones;
- (e) one silver Samsung cell phone;
- (f) one silvery blue and black colored Samsung T-Mobile flip cell phone;
- (g) one gray T-Mobile Samsung flip cell phone;
- (h) one black and dark blue LG flip cell phone; and
- (i) one T-Mobile HD7 HTC Windows cell phone.


2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

CARMEN M. ORTIZ
United States Attorney

By:


Emily Cummings
Assistant U.S. Attorney

Dated: October 5, 2016